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Lisa Cooper, Executive Director

**Narrative Information Sheet**  
**USEPA FY20 Brownfield Assessment Grant**

- 1. Applicant Identification:** Northern Kentucky Area Development District  
22 Spiral Drive, Florence, KY 41042
- 2. Funding Requested:**
  - a. Assessment Grant Type: Community-wide
  - b. Federal Funds Requested: \$300,000
  - c. Contamination: \$206,725 hazardous substance  
\$93,275 petroleum substance
- 3. Location:** The Northern Kentucky Area Development District serves Boone, Kenton, Campbell, Grant, Gallatin, Owen, Pendleton, and Carroll counties. Location of the target area:
  - a) City of Covington b) Kenton County c) Kentucky
  - a) City of Newport b) Campbell County c) Kentucky
- 4. Property Information for Site-Specific Proposals:** N/A
- 5. Contacts:**
  - a. Project Director**  
Dominique DeLucia, Public Administration Specialist  
Northern Kentucky Area Development District  
22 Spiral Drive  
Florence, KY 41042  
Phone: (859) 283-1885  
E-mail: dominique.delucia@nkadd.org
  - b. Chief Executive**  
Lisa Cooper, Executive Director  
Northern Kentucky Area Development District  
22 Spiral Drive  
Florence, KY 41042  
Phone: (859) 283-1885  
E-mail: lisa.cooper@nkadd.org
- 6. Population:** Newport, KY – 15,219 (target area)  
Covington, KY – 40,578 (target area)



**7. Other Factors Checklist:**

Other Factors	Page #
Community population is 10,000 or less.	
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	
The priority brownfield site(s) is impacted by mine-scarred land.	
The priority site(s) is adjacent to a body of water (i.e., the border of the priority site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	1 & 2
The priority site(s) is in a federally designated flood plain.	2
The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy; or will incorporate energy efficiency measures.	
30% or more of the overall project budget will be spent on eligible reuse planning activities for priority brownfield site(s) within the target area.	8

**8. Letter from the State or Tribal Environmental Authority: Attached.**

Thank you for your consideration of this grant application. NKADD is fully committed to restoring its communities to the safe, healthy, and vibrant areas they can be. We hope that the continued redevelopment of our Brownfield sites will lead to this success.

Sincerely,

Lisa Cooper  
Executive Director



## ENERGY AND ENVIRONMENT CABINET

**Matthew G. Bevin**  
Governor

**DEPARTMENT FOR ENVIRONMENTAL PROTECTION**  
**DIVISION OF COMPLIANCE ASSISTANCE**

300 SOWER BOULEVARD  
FRANKFORT, KENTUCKY 40601  
[www.dep.ky.gov](http://www.dep.ky.gov)

**Charles G. Snaveley**  
Secretary

November 22, 2019

Ms. Lisa Cooper, Executive Director  
Northern Kentucky Area Development District  
22 Spiral Drive  
Florence, KY 41042

Re: Kentucky Letter of Support for Brownfield Grant Application

Dear Ms. Cooper:

The Kentucky Department for Environmental Protection (DEP) is supportive of, and committed to, the work of the Northern Kentucky Area Development District (NKADD) to identify and address brownfield sites in the community. DEP is the state agency charged by the legislature with the responsibility of implementing the Kentucky equivalent of the federal Superfund program, and as such, is an essential component of any attempt to address brownfields redevelopment. We support NKADD's application for a Brownfield Assessment Grant for the District and look forward to continuing our work with you on this important issue.

Sincerely,

A handwritten signature in cursive script that reads "Eric Eisiminger".

Eric Eisiminger  
Brownfield Coordinator

cc: Dominique DeLucia, NKADD  
Christoph Uhlenbruch, Division of Waste Management  
Michael Fant, Division of Waste Management, Florence Regional Office

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**1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION**

**a. Target Area and Brownfields:**

i. Background and Description of Target Area: The Northern Kentucky Area Development District (NKADD) serves an eight-county region in the northern most part of Kentucky. The region stretches from the densely populated urbanized cities in Boone, Kenton, and Campbell Counties, to the rural farmlands of Carroll, Gallatin, Grant, Owen, and Pendleton Counties. Northern Kentucky has long been defined by its location along the Ohio River and its relationship with the City of Cincinnati in Ohio. The cities of Covington and Newport were both established in the 1790's along the Ohio River, separated from each other by the Licking River. In 1803 the army built a military post at the mouth of the Licking River, which became the center of activity during the Civil War and in turn increased the area's population and development. New industry boomed with the development of cotton factories, sawmills, tobacco and cigar manufacturers, distilleries, pork packing plants, foundries, and a ship building port. In 1870, the Chesapeake and Ohio Railroad completed a bridge across the Ohio River, connecting Newport and Covington by railroad to Cincinnati, Lexington, and Louisville. Improvements in transportation allowed goods to be shipped quickly and cheaply to most major cities on the eastern seaboard of the United States. Industry and markets expanded further, making Newport home to a major steel manufacturing plant that provided munition to World War II efforts. However, following World War II, urban flight took a toll on Covington and Newport as well as the construction of Interstate 75. Coupled with the Great Depression and a flood in 1937 that left much of Newport under-water, both cities faced significant economic decline. While a rebirth in development and job creation began in the 1990's, redevelopment today is still complicated by the real and perceived environmental contamination left from an industrial past.

The NKADD has identified the cities of Covington and Newport within their eight-county region as target areas to perform assessment activities. Covington and Newport are the most urbanized in Northern Kentucky and face some of the most challenges in recovering from their past. Within these cities there are six census tracts designated as opportunity zones, one of which is split between Covington and the City of Ludlow. Opportunity zones are low-income or underdeveloped designated census tracts that were created by Congress to encourage long-term investments. Investors can receive significant federal tax break and deferrals for investing in a variety of economic development projects within these zones. These designations will be effective for ten years (until 2028) with the goal to create wealth and jobs while making these areas self-sufficient. As of the 2017 five-year population estimates, both cities face significantly higher unemployment (Covington, 9.2%; Newport, 8.8%) and poverty rates (Covington, 24.7%; Newport, 33.3%) then both the state and national averages (Unemployment: KY, 6.8%; US, 6.6%) (Poverty: KY, 18.3%; US, 14.6%). Median household income also falls far below the state and national averages (Covington, \$38,346; Newport, \$33,363; KY, \$46,353; US, \$57,652). Covington has the largest percentage of Northern Kentucky's minority populations. Over 82 percent of African Americans in Northern Kentucky reside in Covington. While the demographics and high concentration of brownfield sites create challenges for redevelopment, these communities are located near major transportation routes and amenities that could be opportunities for revitalization.

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*ii. Description of the Priority Brownfield Sites:* Covington and Newport are littered with former industrial buildings, historical structures with asbestos and lead-based paint concerns, and former commercial districts populated with dry cleaners and gasoline stations. The Route 9 corridor in Newport, which runs parallel with the Licking River, has one of the largest parcels of land that the city has hoped to redevelop for years. The NKADD has identified this site, the **former Newport Steel property**, as a top priority for assessment and redevelopment. Newport Steel closed the plant on this property over 20 years ago and the 17-acre site has been vacant ever since. The mill buildings have all been razed and the property has sat dormant. Assessment work is desperately required before any promising development plans can begin. There are known metals, volatile organic compounds and other potentially hazardous contamination on the site. The property is located within FEMA Zone X – shaded and is protected from flood risk by a levee. Aside from the former Newport Steel site, there are over 60 known industrial brownfields located along the Route 9 corridor. The **Ludlow Incinerator property** has also been identified as a priority site. This property is owned by the City of Ludlow and sits on the border of Devou Park in Covington and is adjacent to census tract 638 that is designated as an opportunity zone. The site is 4.82 acres and was initially developed in the 1930's as the City of Ludlow's municipal incinerator and was abandoned in the 1970's. Currently, there is a small trail from the street to the abandoned and decaying incinerator structure. The structure is approximately 1,500 square feet with a 60-foot high brick smokestack adjacent to the building. The furnaces are currently accessible through four metal portholes and pose both safety and health risks. Due to the nature of the former operation of the site, the residual ash and soil surrounding the structure are known to have hazardous and petroleum contamination. The northeastern portion of the site is located in FEMA Zone AE, a designated floodplain.

**b. Revitalization of the Target Area:**

*i. Reuse Strategy and Alignment with Revitalization Plans:* The City of Newport updated their comprehensive plan in 2015, which speaks to the land use and revitalization plans for the Newport Steel site. Development strategies outlined within the plan specifically mention this site and that work toward its redevelopment needs to be continued. One step towards the potential reuse of this site was the recently completed reconstruction and realignment of Route 9, which now provides direct access to the site. In 2012 the General Assembly appropriated approximately 26 million dollars to connect Route 9 (AA highway) to the Taylor Southgate Bridge. The new four-lane boulevard creates improved connectivity to Covington and the bridge over to Cincinnati. This major infrastructure upgrade is the beginning of revitalization efforts in an area that residents feel has long been neglected. The comprehensive plan recommends that the site should remain industrial in use to maintain a balanced tax base and to provide opportunities for local jobs.

The Kenton County Comprehensive Plan, Direction 2030, addresses the future land use recommendations for Ludlow and Covington. The Ludlow Incinerator property has been recommended for recreation and open space activities due to its location within a floodplain and for its potential to link to Devou Park in Covington. It is currently zoned "conservation" and allows for agricultural and recreational uses. While both the City of Ludlow and Kenton County envision the reuse of this site as recreational, there is not yet a strategy in place due to the

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perceived contamination on the site. The use of these grant funds could greatly assist with these planning efforts.

As a region, the Northern Kentucky Comprehensive Economic Development Strategy (CEDS), prepared for and approved by the federal Economic Development Administration, cites brownfield cleanup as a major priority and is critical to the revitalization of the region. The CEDS plan states, "There are properties in the region, particularly in the urban counties, that the expansion, redevelopment, or reuse of is greatly hampered by the presence of potential presence of hazardous substance, pollutant, or contaminant. The assessment and cleanup of these brownfield sites will open vital land in the urban core for redevelopment. Funds should be sought to support these assessments and cleanups."

*ii. Outcomes and Benefits of Reuse Strategy:* The Newport Steel Site is a large property in a prime location for reuse. It is located near four major interstates, within 100 miles of Columbus, Indianapolis, and Louisville, and the Cincinnati/Northern Kentucky Airport (CVG) is just 20 minutes away with over 175 daily departures. While it's future for reuse is still uncertain, the industrial opportunities this site could provide for the region are immense. Recent expansion and relocations of businesses such as Amazon Prime Air, CTI Clinical Trail and Consulting, Kroger Co, and Perfetti Van Melle USA have invested millions of dollars and created thousands of jobs in Northern Kentucky in the past couple of years. The assessment and cleanup of this brownfield site would open the doors to similar economic investments. The use of this grant would greatly help facilitate the transformation of the Ludlow Incinerator property from brownfield to park and create a connection to the existing Devou Park. On a larger scale, trails from Devou Park and potentially on the Incinerator site will connect to the Riverfront Commons project that is a 11.5-mile multi-use path connecting all six Northern Kentucky river cities. The pathway is planned to cross over the Purple People Bridge to trails in Cincinnati and the Licking River Greenway as well. Eco-system restoration, riverside stabilization, economic development, and recreation are all benefits that Riverfront Commons hopes to achieve.

**c. Strategy for Leveraging Resources:**

*i. Resources Needed for Site Reuse:* To supplement EPA funding, the NKADD will be working closely with their economic development and real estate partners. Most notably, the Catalytic Fund, which is a private sector, not for profit organizations that provides capital via a ten-million-dollar investment fund to fill gaps between traditionally underwritten loans, developer's equity, and project costs. Their efforts are focused on transforming vacant and underutilized buildings in the cities along the Ohio River. The City of Newport offers both a twenty percent investment tax credit for the rehabilitation of certified historic buildings and a property assessment moratorium. The City of Covington offers gap financing and various incentives for the redevelopment of vacant properties. The NKADD's Small Business Lending Program (RLF) can provide flexible financing capital for small businesses who are unable to obtain sufficient private financing for projects deemed of economic benefit to the area and its workforce. The NKADD is also able to provide funds for the remediation of brownfield sites through EPA Brownfield Cleanup RLF funds awarded to the NKADD in 2012. As the RLF receives program income, the NKADD plans to utilize those funds for additional remediation activities. Within Covington and Newport there are six census tracts designated as opportunity zones. The NKADD eight county regional has additional opportunity zones in Boone, Gallatin, Carroll,

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Owen, and Grant counties. As previously mentioned, investors can receive federal tax benefits by investing capital gains in qualified opportunity zones.

ii. *Use of Existing Infrastructure:* The target areas are both urban with existing infrastructure already in place and in close proximity to brownfield sites. Recently completed near the priority site was a major transportation project, the extension of Route 9. The extension continues the multi-lane highway through the western edge of Newport (along the Licking River) to a roundabout at the base of the Taylor-Southgate Bridge near Newport on the Levee. The new highway provides a highway alternative from the I-275 Wilder exit to an Ohio River bridge crossing to Cincinnati if drivers want to avoid I-471. This major transportation project will open development opportunities for the previously neglected west side of Newport, specifically the former Newport Steel site. This new \$45-million installation will provide better connections to Covington and Cincinnati and hopes to be a catalyst for new development in the area.

## **2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT**

### **a. Community Need**

i. *The Community's Need for Funding:* The cities of Covington and Newport are considered the most urban areas in the NKADD's eight county region but have suffered significant population decline as manufacturing jobs have left the area over the past two decades. High unemployment and poverty rates and low median household incomes make it difficult for these cities to fund a brownfield program without additional help. These cities face several development challenges such as aging infrastructure, lack of transportation upgrades, as well as increased costs for public pensions and a 911 radio communication system. The NKADD is unable to draw on other sources of funding for brownfield assessments because as a regional coordinating agency, we do not have the taxing authority to appropriate funds. While a surge in redevelopment has occurred along the Ohio River, investment is still not picking up and extending south into the core of these cities or along the Licking River. Many of the vacant and blighted industrial sites along the Licking River pose a threat to the redevelopment efforts that are planned for the area.

ii. *Threats to Sensitive Populations:*

- 1) *Health or Welfare of Sensitive Populations:* According to EPA's Environmental Justice Screening and Mapping Tool (EJSCREEN), those in the target area fall in the 79<sup>th</sup> percentile for low income population and 74<sup>th</sup> percentile for less than a high school education when compared to the rest of the U.S. population. As previously stated in section 1.a.i. the poverty rates within the target area are higher than both the state and national rates and have increased by 40 percent since 2000. Approximately 44 percent of people below the poverty level within the target area have less than a high school education. When looking at birth and infant mortality statistics, Northern Kentucky has seen a decline in the teen birth rate but an increase in infant mortality. The Ludlow and Covington region has the highest rate of infant mortality (12.7 per 1,000 live births), nearly two times the rate of the Northern Kentucky Health District in 2012-2016. The health department states that the three leading causes of infant mortality are premature births, congenital anomalies, and sudden unexpected infant deaths.

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Northern Kentucky continues to have high rates of smoking during pregnancy (19.3% of mothers) despite the known harmful effect.

- 2) *Greater than Normal Incidence of Disease and Adverse Health Conditions:* According to the EPA, Campbell and Kenton County are nonattainment areas for the 8-hour ozone standard (0.075 ppm). The Clean Air Task Force ranked the risk of diesel soot cancer risk for a Kenton County resident as 1 in 4,835, exceeding the risk of all other air toxins combined. That risk is 207 times greater than EPA's acceptable cancer level of 1 in a million. According to Centers for Disease Control and Prevention, Kentucky has the highest cancer rate in the country. Since 1990, cancer deaths have increased by 11 percent. The Northern Kentucky population has also seen an increase in chronic lower respiratory disease mortality in the past 10 years. When compared to the rest of the U.S. population, those in the target area are in the 95<sup>th</sup> percentile for diesel particulate matter level in the air, 94<sup>th</sup> percentile for proximity to Risk Management Plan (RMP) sites, and in the 90<sup>th</sup> percentile for potential lead paint exposure. America's 2019 Health Rankings ranked Kentucky as 44<sup>th</sup> healthiest state (50<sup>th</sup> being the worst). Kentucky has a high prevalence of tobacco use, cancer deaths, and frequent mental distress.
- 3) *Disproportionately Impacted Populations:* The Northern Kentucky Health District defines a vulnerable population as any area which has a high percentage (22% or more) of people below the poverty level and with less than a high school education. The target area of Covington and Newport have the highest percentage of vulnerable populations in the region. Their research shows a direct correlation between vulnerable populations and higher health risks. The presence of brownfields discourage investment in the target area and are a disincentive for new or expanding business that could provide employment to those living in poverty. This grant will be the first step in remediation and reuse of the brownfield sites within Northern Kentucky that will generate economic development and opportunities for those vulnerable populations.

**b. Community Engagement**

- i. Community Involvement: The following table represents the community partners that will be involved throughout the project.

Partner Name	Point of Contact	Specific Role in the Project
Catalytic Fund	Jeanne Schroer jschroer@thecatalyticfund.org 859-757-0519	Assist in real estate investments of redevelopment projects in blighted urban areas.
Neighborhood Foundations	Tom Guidugli tguidugli@neighborhoodfoundations.com 859-581-2533	Give community support for quality affordable housing.
Center for Great Neighborhoods	Adam Rockel adam@greatneighborhoods.org 859-547-5550	Encourage positive growth within the community and the rehabilitation of underutilized buildings.
Southbank Partners	Jack Moreland jmoreland@southbankpartners.com	Coordinate economic development efforts among developers, stakeholders, and lending institutions.



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	859-655-7700	
Tri-County Economic Development	Jennifer Panepinto jpp@northernkentuckyusa.com 859-344-0040	Provide support to economic development efforts and the attraction of new businesses.
Planning and Development Services of Kenton County (PDS)	Dennis Gordon dgordon@pdskc.org 859-331-8980	Support the efforts of conducting specialized planning studies and administering zoning codes.
Covington Neighborhood Collaborative	<i>Website contact</i> www.covingtoncnc.org	Assist in providing community input and dissemination information about the project.
Newport Neighborhood Groups	<i>Website contact</i> www.newportky.gov/ neighborhoods.aspx	Assist in providing community input and dissemination information about the project.
Northern Kentucky Health Dept.	Steve Divine Steve.divine@nkyhealth.org 859-341-4151	Encourage the redevelopment of sites that pose health risks to sensitive populations.
Gateway Community and Technical College	Dr. Yohanes Honu Yohanes.honu@kctcs.edu 859-442-1638	Provide community support and assist in the enhancement of quality of life for residents.
Covington Business Council	Pat Frew pfrew@cbcky.com 859-431-1500	Promote economic growth and the attraction of businesses.

*iii. Incorporating Community Input:* Covington and Newport have very active citizen participation through their neighborhood associations, which will meet as smaller focus groups to help update the brownfield site inventory list and discuss the reuse of individual sites. Public meetings will be held periodically throughout the 3-year project to present assessment findings, address public concerns and questions, and visioning for the future reuse of brownfield sites. Meetings will be advertised through newspapers, the NKADD website and newsletter, Covington and Newport's city websites, social media, and direct email to interested parties. Following the initial public meeting, an Advisory Committee comprised of a variety of residents and stakeholders will be formed. The Committee will meet on a quarterly basis and become a lead in community outreach efforts. An informational project brochure along with the NKADD Brownfield Coordinator contact information and how to get involved will be distributed to stakeholder groups, neighborhood organizations, and various public spaces. All meeting minutes and project updates will be available to the public on the NKADD website.

### **3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS**

#### **a. Description of Tasks/Activities and Outputs:**

<b>Task 1: Program Oversight</b>
i. Project Implementation: Oversee all grant implementation activities to ensure effective and efficient compliance with EPA cooperative agreement terms and conditions. Activities include coordination between the environmental contractor, the Kentucky Department for Environmental Protection, and EPA project officer, and attendance at national and regional brownfield conferences and workshops.
ii. Anticipated Project Schedule: Duration of 3-year period.

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iii. Task/Activity Lead: NKADD Brownfield Coordinator and Finance Director
iv. Outputs: Quarterly reports, MBE/WBE reporting, federal financial reports, ACRES updates, and brownfield conference attendance.
<b>Task 2: Inventory Update and Community Outreach</b>
i. Project Implementation: The NKADD will lead a comprehensive community outreach process by hosting community-wide meetings to raise awareness of what brownfield sites are, gather input on site inventory, and to provide updates on assessment and reuse activities. NKADD will prepare outreach materials and keep the community informed through a website and social media. A Steering Committee comprised of residents, stakeholders, and local officials will be formed to ensure project targets are being met throughout the three-year period.
ii. Anticipated Project Schedule: Outreach to be completed throughout the 3-year period. Quarterly Steering Committee meetings. Inventory to be updated within first 6 months.
iii. Task/Activity Lead: NKADD Brownfield Coordinator
iv. Outputs: Database of brownfield sites, community meetings, steering committee, informational brochures and other print materials, website and social media updates.
<b>Task 3: Environmental Site Assessments (ESA)</b>
i. Project Implementation: All Environmental Site Assessments (ESA) will be performed by a Qualified Environmental Professional (QEP) and conducted in accordance with the American Society for Testing Materials Standard (ASTM) 1527-13 and the guidelines set forth in the US EPA's AAI Rule. The NKADD Brownfield Coordinator will review QEP reports and facilitate site access and communication with property owners. If a site outside of the target area shows a significant need, the Steering Committee will meet and rank it among the priority criteria. Sites outside of the target areas will not be considered until the second year of performance.
ii. Anticipated Project Schedule: Quarters 5-11.
iii. Task/Activity Lead: Qualified Environmental Professional
iv. <b>Outputs:</b> Generic Quality Assurance Project Plan (QAPP), 12 Phase I ESA's, 6 Phase II ESA's.
<b>Task 4: Cleanup Planning</b>
i. Project Implementation: Cleanup planning activities include the completion of an Analysis of Brownfield Cleanup Alternatives (ABCA) and/or corrective action plans to evaluate the remediation efforts needed for the priority sites. This task also includes the creation of site reuse assessments to identify reuse options for priority brownfield sites.
ii. Anticipated Project Schedule: Quarters 7-12.
iii. Task/Activity Lead: Qualified Environmental Professional
iv. Outputs: 3 Analysis of Brownfield Cleanup Alternatives (ABCA) and site reuse assessments.

**b. Cost Estimates:** The costs associated with each task are presented in the table below.

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Budget		Program Oversight	Inventory & Community Outreach	Site Assessments	Cleanup Planning	Total
Personnel	Haz.	\$7,500	\$8,000	\$3,000	\$4,000	<b>\$22,500</b>
	Pet.	\$1,500	\$2,000	\$1,000	\$1,000	<b>\$5,500</b>
Fringe Benefits	Haz.	\$3,375	\$3,600	\$1,350	\$1,800	<b>\$10,125</b>
	Pet.	\$675	\$900	\$450	\$450	<b>\$2,475</b>
Travel	Haz.	\$4,150	\$0	\$0	\$0	<b>\$4,150</b>
	Pet.	\$0	\$0	\$0	\$0	<b>\$0</b>
Supplies	Haz.	\$0	\$750	\$0	\$200	<b>\$950</b>
	Pet.	\$0	\$250	\$0	\$50	<b>\$300</b>
Contractual	Haz.	\$0	\$0	\$115,500	\$53,500	<b>\$169,000</b>
	Pet.	\$0	\$0	\$56,000	\$29,000	<b>\$85,000</b>
Total Hazardous (Haz.)		\$15,025	\$12,350	\$119,850	\$59,500	<b>\$206,725</b>
Total Petroleum (Pet.)		\$2,175	\$3,150	\$57,450	\$30,500	<b>\$93,275</b>
Total Direct Costs		\$17,200	\$15,500	\$177,300	\$90,000	<b>\$300,000</b>
Indirect Costs		\$0	\$0	\$0	\$0	<b>\$0</b>
<b>Total Budget</b>		<b>\$17,200</b>	<b>\$15,500</b>	<b>\$177,300</b>	<b>\$90,000</b>	<b>\$300,000</b>

*\*Fringe Benefits are estimated to cost 45 percent of salaries.*

**Task 1 - Program Oversight:** (\$17,200) Personnel costs include 180 hours at an average of \$50/hour for a total of \$9,000. Under this task, travel costs will include the attendance of two brownfield conferences by NKADD staff. Associated travel costs include \$675 for airfare for each conference (\$1,350); daily expenses for hotel and meals of \$300/day for 8 days (\$2,400); and \$50/day for incidentals such as parking or public transportation for 8 days (\$400).

**Task 2 - Inventory Update and Community Outreach:** (\$15,500) Personnel costs include 200 hours at an average of \$50/hour for a total of \$10,000. Any costs incurred above this by the NKADD's GIS Specialist will be considered an in-kind contribution. Funds for supplies include \$1,000 for printing costs, advertisement of public notices, presentation supplies, and miscellaneous office supplies.

**Task 3 – Environmental Site Assessments (ESA):** (\$177,300) Personnel costs include 60 hours at an average of \$50/hour for a total of \$4,000. Contractual costs associated with the task are as follows: 1 Generic Quality Assurance Project Plan (QAPP) at \$3,500; 12 Phase I ESAs at \$4,000 each for a total of \$48,000 (8 hazardous, 4 petroleum); and 6 Phase II ESAs at an average of \$20,000 each for a total of \$120,000 (4 hazardous, 2 petroleum).

**Task 4 - Cleanup Planning:** (\$90,000) Personnel costs include 80 hours at an average of \$50/hour for a total of \$5,000. Contractual costs associated with the tasks are as follows: 5 Analysis of Brownfield Cleanup Alternatives (ABCA) at \$4,500 each for a total of \$22,500 (3 hazardous, 2 petroleum); and 3 Site Reuse Plans at an average of \$20,000 each for a total of \$60,000 (2 hazardous, 1 petroleum).

**c. Measuring Environmental Results:** The NKADD plans to track, measure, and evaluate progress through the completion of quarterly reports, updating the ACRES database system,

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monthly meetings with the project team and members serving on the Steering Committee, and regular communication with the EPA Project Officer. Specific performance metrics detailed in the work plan will be used to summarize project accomplishments and to ensure project targets are being met. For this brownfield grant the NKADD expects to measure the following outputs: the completion of a brownfield sites inventory, the number of environmental site assessments, and the number of community meetings held. Overall outcomes the NKADD expects to measure both during and after the grant award period is the amount of funding leveraged through the reinvestment of properties, number of jobs created as sites are redeveloped, the number of acres made ready for reuse or as greenspace, and whether the project have minimized the exposure to hazardous and petroleum substances.

**4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE**

**a. Programmatic Capability**

i. Organizational Structure and Description of Key Staff: The NKADD has been administering federal and state grants for over forty years. The Community Development Division has staff dedicated to writing, strategizing, implementing, and administering grant programs. The NKADD's previous experience in managing EPA Brownfield Assessment projects will contribute to the successful and timely completion of the proposed project. The Brownfields Coordinator for this assessment project will be Dominique DeLucia, who has administered the NKADD's previous EPA Assessment grant and RLF cleanup grant. Meghan Sandfoss, the Associate Director of the Public Administration and Community Development Division, has over twelve years of experience in grant and project management and will serve as a liaison with community partners, developers, government agencies, and financial institutions. Additional support will be provided by NKADD's Finance Director, Spencer Rodgers. The Community Development Division has a well-qualified staff with backgrounds in public administration and city and regional planning. Inter-office plans ensure that if employee turnover occurs, projects and programs are not affected. All projects have at least one staff person who assists the project manager. Staff assigned to projects are kept informed of project status, reporting, funding allocations and expenditures, community input, communications with the awarding agency, and all other pertinent information. The NKADD has worked to obtain a qualified environmental engineer in compliance with federal procurement requirements to carry out specific technical tasks.

ii. Acquiring Additional Resources: The NKADD is familiar with and will carry out the Kentucky Model Procurement Code (KRS 45A) to acquire any additional expertise or resources to successfully complete grant requirements. The Code sets out the methods in which the NKADD must bid, negotiate, and award contracts. The standard competitive sealed bidding process involves requisitioning, public solicitation, receipt of response, evaluation, and contract award. When this method is not practical, requirements may be solicited by the competitive negotiation method where a Request for Proposals (RFP) or Request for Quotations (RFQ) will be solicited.

**b. Past Performance and Accomplishments**

i. Currently Has or Previously Received an EPA Brownfields Grant

**FY2020 EPA Community-Wide Assessment Grant  
Northern Kentucky Area Development District**

1) Accomplishments: In 2010, the Licking River Greenway Brownfield Coalition was awarded a Petroleum Assessment Grant in the amount of \$200,000 where NKADD served as the lead for the project. The Coalition was able to complete seven Phase I, and five Phase II assessments. The NKADD and Lineback Funkhouser Inc. (environmental consultant) were able to donate a large portion of time and work to ensure the maximum amount of funds went to performing site assessments. The grant was successfully closed out, with all funds expended. In 2012, the NKADD was awarded a Brownfield Revolving Loan Fund (RLF) in the amount of \$850,000. The RLF awarded six subgrants, mostly for the cleanup of lead and asbestos for the redevelopment of single-family affordable homes for low-income families. One loan was awarded for the capping of contaminated soils on a site in Ludlow, Kentucky, leading to the creation of parking spaces for the city building and a space to hold community events. In 2014, the NKADD was awarded a Coalition Hazardous Assessment Grant in the amount of \$600,000. As a result, forty-three Phase I, eighteen Phase II, and six ABCAs were completed. The majority of completed assessments lead the way for infill development to occur with many of those sites now occupied by local businesses. The assessment grant was closed out in 2017 with all project activities entered into the ACRES system.

2) Compliance with Grant Requirements: The NKADD has received the following EPA Brownfield Grants:

Type	Issued	Closed	Amount	Funds Remaining
Petroleum Assessment Grant	2010	2013	\$200,000	\$0
Brownfield Cleanup RLF Grant	2012	2018	\$850,000	\$254,566.18
EPA Brownfield Assessment Grant	2014	2017	\$600,000	\$63,294.44

The 2010 Petroleum Assessment Grant met all required EPA timelines, including the creation of a work plan, partnering with community agencies to create an inventory of sites, procurement of a reputable and successful environmental consultant, submission of all quarterly reports, and ACRES reporting. The grant was closed out in 2013 with all funds expended. The 2014 Coalition Assessment grant for both petroleum and hazardous substances also submitted quarterly reports and ACRES updates in a timely manner. This grant was closed out in 2017 with \$63,294.44 remaining. During the life cycle of the grant the NKADD experienced staff turnover causing unforeseen transition periods. The NKADD worked with their EPA Project Officer to maintain compliance with the work plan and to get back on schedule. Momentum was regained in 2016 and staff worked persistently to expend funds and provide assessment activities to property owners and community agencies in need. The 2012 Brownfield RLF Cleanup Grant faced the same staff turnover challenges and was closed out in 2018 with \$254,566.18 remaining. After working with the EPA Project Officer, the NKADD was awarded a no-cost time extension, allowing the term of the grant to be extended to September 2018. It was during this time that many projects were being referred to the RLF for cleanup assistance after going through the assessment process. The NKADD was able to award a loan for cleanup activities in Ludlow, Kentucky.

**FY2020 EPA Community-Wide Assessment Grant  
Northern Kentucky Area Development District**

**III. B. Threshold Criteria for Assessment Grants**

**1. Applicant Eligibility**

The Northern Kentucky Area Development District is eligible to apply for the EPA Brownfields Assessment as it is a government entity created by the state legislature (KRS 147A.050, attached). The NKADD is a means by which local officials and citizens unite to provide for the planned growth of their area. They are therefore a regional organization that assists in the formulation and implementation of human resources and infrastructure related plans. In addition to its regional planning role, the NKADD also provides technical and management assistance to local communities on a broad range of topics. The NKADD currently serves the eight most northern counties in Kentucky. The organization has a long and successful history in working with local governments to implement programs and projects that serve the community.

**2. Community Involvement**

The NKADD plans to form a Steering Committee, comprised of a variety of residents, community leaders, and stakeholders to lead community outreach efforts. This committee will work to gain input regarding the location and reuse of brownfield sites from all demographics, with a strong focus on involving the vulnerable population, within the target area. The Steering Committee will meet on a quarterly or as needed basis throughout the three-year project period to make sure project targets are being met. A number of public meetings will be held to help update the brownfield site inventory list and discuss the reuse of individual sites. Notices of these meetings will be advertised through newspapers, the NKADD website and newsletter, social media outlets, and flyers posted in community meeting areas. An informational project brochure along with the NKADD Brownfield Coordinator's contact information and how to get involved will also be distributed to stakeholder groups, neighborhood organizations, and available at various public spaces. All meeting minutes and project updates will be available to the public on the NKADD website. We will also be working closely with our partner agencies including developers, investors, and elected officials to bring awareness to the project and to help meet the regions goals of revitalizing brownfield properties and mitigating potential health risks. Many of these forms of engagement were used in the previous Brownfield Coalition Hazardous Assessment Project and have proved to be successful.

**3. Expenditure of Assessment Grant Funds**

The Northern Kentucky Area Development District does not have an active EPA Brownfields Assessment Grant.

**147A.050 Area development districts created.**

There is hereby created and established in the Commonwealth fifteen (15) area development districts consisting of the following counties:

- (1) Purchase Area Development District which shall include the counties of Ballard, Carlisle, Hickman, Fulton, McCracken, Graves, Marshall, and Calloway;
- (2) Pennyrile Area Development District which shall include the counties of Livingston, Crittenden, Lyon, Caldwell, Hopkins, Muhlenberg, Trigg, Christian and Todd;
- (3) Green River Area Development District which shall include the counties of Union, Henderson, Webster, McLean, Daviess, Ohio and Hancock;
- (4) Barren River Area Development District which shall include the counties of Logan, Simpson, Butler, Warren, Edmonson, Hart, Barren, Allen, Metcalfe and Monroe;
- (5) Lincoln Trail Area Development District which shall include the counties of Breckinridge, Meade, Grayson, Hardin, Larue, Nelson, Washington, and Marion;
- (6) Jefferson Area Development District which shall include the counties of Bullitt, Henry, Jefferson, Oldham, Shelby, Spencer and Trimble;
- (7) Northern Kentucky Area Development District which shall include the counties of Boone, Kenton, Campbell, Carroll, Gallatin, Owen, Grant and Pendleton;
- (8) Buffalo Trace Area Development District which shall include the counties of Bracken, Mason, Robertson, Fleming and Lewis;
- (9) Gateway Area Development District which shall include the counties of Rowan, Bath, Montgomery, Menifee, and Morgan;
- (10) Fivco Area Development District which shall include the counties of Greenup, Boyd, Carter, Elliott, and Lawrence;
- (11) Big Sandy Area Development District which shall include the counties of Johnson, Magoffin, Martin, Floyd, and Pike;
- (12) Kentucky River Area Development District which shall include the counties of Wolfe, Owsley, Lee, Breathitt, Leslie, Perry, Knott, and Letcher;
- (13) Cumberland Valley Area Development District which shall include the counties of Jackson, Rockcastle, Laurel, Clay, Knox, Whitley, Bell, and Harlan;
- (14) Lake Cumberland Area Development District which shall include the counties of Taylor, Adair, Green, Casey, Russell, Pulaski, Clinton, Cumberland, Wayne, and McCreary; and
- (15) Bluegrass Area Development District which shall include the counties of Anderson, Franklin, Woodford, Mercer, Boyle, Lincoln, Garrard, Jessamine, Fayette, Scott, Harrison, Bourbon, Nicholas, Clark, Madison, Powell, and Estill.

**History:** Created 1972 Ky. Acts ch. 125, sec. 1.

## Application for Federal Assistance SF-424

\* 1. Type of Submission:

- ☐ Preapplication  
☒ Application  
☐ Changed/Corrected Application

\* 2. Type of Application:

- ☒ New  
☐ Continuation  
☐ Revision

\* If Revision, select appropriate letter(s):

\* Other (Specify):

\* 3. Date Received:

12/03/2019

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

\* a. Legal Name: Northern Kentucky Area Development District

\* b. Employer/Taxpayer Identification Number (EIN/TIN):

61-0719369

\* c. Organizational DUNS:

1566937070000

d. Address:

\* Street1:

22 Spiral Drive

Street2:

\* City:

Florence

County/Parish:

\* State:

KY: Kentucky

Province:

\* Country:

USA: UNITED STATES

\* Zip / Postal Code:

41042-000

e. Organizational Unit:

Department Name:

Division Name:

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:

Mrs.

\* First Name:

Dominique

Middle Name:

\* Last Name:

DeLucia

Suffix:

Title: Public Administration Specialist

Organizational Affiliation:

\* Telephone Number:

859-283-1885

Fax Number:

\* Email: dominique.delucia@nkadd.org



## Application for Federal Assistance SF-424

### \* 9. Type of Applicant 1: Select Applicant Type:

D: Special District Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

\* Other (specify):

### \* 10. Name of Federal Agency:

Environmental Protection Agency

### 11. Catalog of Federal Domestic Assistance Number:

66.818

CFDA Title:

Brownfields Assessment and Cleanup Cooperative Agreements

### \* 12. Funding Opportunity Number:

EPA-OLEM-OBLR-19-05

\* Title:

FY20 GUIDELINES FOR BROWNFIELD ASSESSMENT GRANTS

### 13. Competition Identification Number:

Title:

### 14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

### \* 15. Descriptive Title of Applicant's Project:

Northern Kentucky Area Development District's Community-wide Assessment Grant.

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

**Application for Federal Assistance SF-424****16. Congressional Districts Of:**\* a. Applicant \* b. Program/Project 

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

**17. Proposed Project:**\* a. Start Date: \* b. End Date: **18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="300,000.00"/>
* b. Applicant	<input type="text" value="0.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="0.00"/>
* f. Program Income	<input type="text" value="0.00"/>
* g. TOTAL	<input type="text" value="300,000.00"/>

**\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- ☐ a. This application was made available to the State under the Executive Order 12372 Process for review on .
- ☒ b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- ☐ c. Program is not covered by E.O. 12372.

**\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

**21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

☒ \*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

**Authorized Representative:**

Prefix:  \* First Name:

Middle Name:

\* Last Name:

Suffix:

\* Title: \* Telephone Number:  Fax Number: \* Email: \* Signature of Authorized Representative:  \* Date Signed: